

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

IN RE:

David Lyn Luttrell

§

Case no. 24-41512-mxm13

§

Debtor(s)

§

CHAPTER 13

AMENDED NOTICE OF ADDITIONAL FEES AND RULE 2016 DISCLOSURES

NO HEARING WILL BE CONDUCTED ON THIS NOTICE UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT ELDON B. MAHON U.S. COURTHOUSE, 501 W. 10TH ST., RM. 147, FORT WORTH, TX 76102-3643, BEFORE THE CLOSE OF BUSINESS ON FEBRUARY 13, 2025. WHICH IS AT LEAST FOURTEEN (14) DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY SHALL BE SERVED UPON COUNSEL FOR THE ATTORNEY OR LAW FIRM SUBMITTING THIS NOTICE, THE DEBTOR, AND THE CHAPTER 13 TRUSTEE PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY AND THE CHAPTER 13 TRUSTEE.

IF NO HEARING ON THIS NOTICE IS TIMELY REQUESTED, THE FEES AND COSTS REQUESTED HEREIN SHALL BE DEEMED ALLOWED AND MAY BE DISBURSED BY THE CHAPTER 13 TRUSTEE OR PAID DIRECTLY TO THE ATTORNEY OR LAW FIRM FILING THIS NOTICE AS SET OUT HEREIN.

Pursuant to Paragraph 21 of the Standing Order Concerning all Chapter 13 Cases for the Northern District of Texas ("Standing Order"), the undersigned gives notice of the following requested Additional Fees and related costs, if applicable.

1. The source of the compensation is: ☒ Debtor(s) or ☐ OTHER (specify source):

2. [PICK ONE]: ☒ I have not agreed to share the Additional Fees set out herein with any other person unless they are a member or shareholder of or an associate employed by my law firm.

☐ I have agreed to share the Additional Fees with another person or persons who are not a member or shareholder of or an associate employed by my law firm. A copy of the agreement,

together with a list of the names of the people sharing in the compensation and the amount each is to receive, is attached.

3. The total amount of any fees and costs that I or my law firm have become entitled to receive, prior to this Notice of Additional Fees, but not including the Additional Fees and costs requested herein: \$__4000.00_____. (Include all fees even if not yet paid and include the Standard Fee or Business Standard Fee.)

4. The Additional Fees and costs requested herein [PICK ONE]:

☐ have already been paid to me ☐ will be paid to me directly

X - will be paid by the Chapter 13 Trustee.

☐ \$_____ will or has been paid to me directly and \$_____ to be paid by the Trustee.

5. Debtor(s) has/have agreed to the Additional Fees and costs requested herein.

6. In accordance with the provisions of the Standing Order, I request Additional Fees in the amount of \$200.00 (or \$_____, if less) for (indicate requested fees):

☐ Post-confirmation motion to reinstate case

☐ Motion to Extend/Impose the Automatic Stay ☐ Fee included in Plan Base Amount pre-confirmation

☐ Chapter 13 Debtor's Request to Incur Debt (to purchase a vehicle)

7. In accordance with the provisions of the Standing Order, I request Additional Fees in the amount of \$450.00 (or \$_____, if less) for (indicate requested fees):

☐ Case in which Debtor will receive 3002.1 notices ☐ Fee included in Plan Base Amount pre-confirmation

☐ Representation on a post-confirmation Plan Modification filed by the Trustee or an unsecured creditor.

☐ Motion to Sell Real or Personal Property

☐ Motion to Incur Debt (other than Debtor's **Request** to Incur Debt to purchase a vehicle)

☐ Motion to modify/refinance mortgage (other than through The LMM program)

☐ Motion to Approve Compromise and Settlement Agreement

☐ Motion for Relief from the Automatic Stay pursuant to paragraph 21(g)(8)(E) of General Order 2021-**.

8. In accordance with the provisions of the Standing Order, I request Additional Fees in the amount of \$650.00 (or \$_____, if less) for (indicate requested fees):

X Post-confirmation Plan Modification filed by the Debtor.

9. In addition to the fees requested herein and in accordance with the applicable provisions of the Standing Order, I request reimbursement for costs in the amount of \$_____ for (describe the costs) _____.

Wherefore, premises considered, I or my firm pray/prays for the allowance of the fees and costs set out herein to be paid as set out herein and for such other and further relief, both general and specific, to which I or my firm may show myself/itself justly entitled.

Date: January 31, 2025.

Respectfully submitted,

By: /s/ Clayton L. Everett
Clayton L. Everett
State Bar No. 24065212
clayton@norredlaw.com
Norred Law, PLLC
515 E. Border St.
Arlington, Texas 76010
Telephone: (817) 704-3984
Fax: (817) 524-6686
Attorney for Debtor

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that the foregoing notice was served on the 31st day of January 2025 on the following by ECF:

Trustee:

Tim Truman
Standing Chapter 13 Trustee
6851 N.E. Loop 820, Suite 300
North Richland Hills, TX 76180

Debtor:

David Lyn Luttrell
2209 Pontiac Dr.
Arlington, Texas 76013

U.S. Trustee:

1100 Commerce St., Rm. 976
Dallas, TX 75242

/s/Clayton Everett
Clayton Everett